

SK:TBM  
F. #2021R01073

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

JONATHAN GOULBOURNE,  
also known as "Bobcat,"

Defendant.

SECONDED AMENDED  
COMPLAINT & AFFIDAVIT  
IN SUPPORT OF ARREST  
WARRANT

(21 U.S.C. §§ 846, 841(b)(1)(C))

Case No. 22 MJ 100

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EASTERN DISTRICT OF NEW YORK, SS:

JOHN LIVINGSTON, being duly sworn, deposes and states that he is a Task Force Officer with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

On or about December 3, 2021, within the Eastern District of New York and elsewhere, the defendant JONATHAN GOULBOURNE, also known as "Bobcat," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute narcotics, to wit, marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Section 846 and 841(b)(1)(C))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Seconded Amended Complaint is to set forth only

1. I am a Task Force Officer with the FBI and have been involved in the investigation of cases involving unlawful drug trafficking. During my career in law enforcement, I have conducted and participated in, among other things, surveillance, debriefings of eyewitnesses and informants, and reviews of electronic evidence. I am familiar with the facts and circumstances set forth below from my participation in the investigation, conversations with other law enforcement officers and review of reports, and my training and experience.

2. On or about December 3, 2021, the New York City Police Department (“NYPD”) responded to reports of gunfire in and around a particular residence in Brighton Beach, Brooklyn, New York (the “Residence”), which I know is used as a rental property through Airbnb. A male (the “Decedent”) was found inside the Residence unconscious, having sustained numerous gunshot wounds to his legs and chest, and he died a few hours later. A second male (“Subject 1”) was also found inside the Residence, having sustained a gunshot wound to his leg. Subject 1 identified himself to the NYPD and was taken to the hospital for his injury. Inside the Residence the NYPD recovered, among other things, two semi-automatic firearms, numerous spent shell casings, a large duffle bag, inside of which were smaller, vacuum-sealed bags of a green leafy substance, a vacuum sealing machine, a money counting machine and a bag containing bundles of real and counterfeit U.S. currency.

3. In the vicinity of the Residence, the NYPD recovered, among other things, two semi-automatic firearms and two large duffle bags, inside of which were smaller,

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those facts necessary to establish probable cause to arrest, I have not described all relevant facts and circumstances of which I am aware. The primary differences between the Second Amended Complaint and the Amended Complaint are set forth below in footnote 2.

vacuum-sealed bags of a green leafy substance. Subsequent testing revealed that the green leafy substance was in fact marijuana.

4. The NYPD recovered a cellular phone from the Decedent, which revealed that JONATHAN GOULBOURNE and Co-Conspirator 1 were in communication with the Decedent before the planned narcotics transactions. Specifically:

a. On December 2, 2021, at approximately 1:49 p.m., the Decedent messaged a number ending 1952 and stated, “this is G Victor’s boy. Saw Sean last night hoping they make a move today.” In February 2019, in connection with a different case, JONATHAN GOULBOURNE provided the number ending 1952 to the NYPD as his phone number. Additionally, on or about February 10, 2022, JONATHAN GOULBOURNE provided the number ending 1952 to law enforcement as his number.

b. On December 2, 2021, at approximately 7:44 p.m., the Decedent messaged a number ending 4466 and stated, “Hit me back we are waiting on you.” At approximately 9:34 p.m., the number ending 4466 messaged the Decedent, “15 mins.” In a separate text conversation with the number ending 1952, the Decedent attributed the number ending in 4466 to “the little guy.” I know that based on reports regarding Co-Conspirator 1’s previous arrests and deportation and my personal observations that he is approximately 5 foot tall.

5. License plate reader data for a grey Dodge Caravan registered to JONATHAN GOULBOURNE revealed that on December 2, 2021, at approximately 9:26 p.m., the vehicle was driving southbound on Pennsylvania Avenue in Brooklyn, New York, in the direction of and approximately 10 miles from the Residence.

6. Security footage from the Residence and the surrounding area, as well as telephone records, revealed, among other things, that JONATHAN GOULBOURNE served as a getaway driver for Co-Conspirator 1. Specifically, on the evening of December 2, 2021, and into the early morning of December 3, 2021, the following occurred, among other things:

- a. On December 2, 2021, at approximately 5:02 p.m., Subject 1 and his female associate (“Subject 2”) entered the Residence.
- b. At approximately 8:29 p.m., Subject 1 exited the Residence and returned a few minutes later with the Decedent.
- c. At approximately 10:15 p.m., the Decedent left the Residence while talking on a cellphone.
- d. At approximately 10:23 p.m., the Decedent returned to the Residence with Co-Conspirator 1 and two other males (“Co-Conspirator 2” and “Co-Conspirator 3”).<sup>2</sup>
- e. On December 3, 2021, at approximately 12:35 a.m., Subject 1 left the Residence and returned a few minutes later with two male associates (“Subject 3” and “Subject 4”). Subject 1, Subject 3 and Subject 4 each carried a very large duffle bag

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<sup>2</sup> The Second Amended Complaint stated that Co-Conspirator 2 was believed to be the defendant JONATHAN GOULBOURNE based on screenshots from the security footage as compared to his arrest photographs. JONATHAN GOULBOURNE’s criminal history described him as being five foot eight inches tall. On or about February 10, 2022, I met JONATHAN GOULBOURNE in person and, based on my personal observations, believe he is approximately five foot three inches tall. Accordingly, comparing JONATHAN GOULBOURNE’s stature to Co-Conspirator 2’s stature in the screenshots from the security footage, I no longer believe JONATHAN GOULBOURNE to be Co-Conspirator 2.

into the Residence. Subject 1 left the Residence and returned a few minutes later, carrying a fourth very large duffle bag into the Residence.<sup>3</sup>

- f. At approximately 12:42 a.m., Subject 2 left the Residence.
- g. At approximately 1:30 a.m., Subject 1 exited the Residence talking on a cellphone and can be heard stating something regarding “bad weed.”
- h. At approximately 2:06 a.m., Co-Conspirator 2 exited the Residence. One minute later, he returned with two males (“Co-Conspirator 4” and “Co-Conspirator 5”).
- i. At approximately 2:18 a.m., gunshots can be heard from inside the Residence.
- j. At approximately 2:19 a.m., Co-Conspirator 4 and Co-Conspirator 5 fled the Residence.
- k. At approximately 2:20 a.m., on a nearby street, Co-Conspirator 4 entered a silver Volkswagen Tiguan.
- l. At approximately 2:20 a.m., Co-Conspirator 1 and Co-Conspirator 3 ran out of the Residence while holding guns. Co-Conspirator 1 carried a small duffle bag and Co-Conspirator 3 carried and then dragged a very large duffle bag.
- m. At approximately 2:22 a.m., Co-Conspirator 1 ran away from the Residence southbound on Brighton 4 Court to the intersection of Ocean View Avenue,

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<sup>3</sup> The four very large duffle bags depicted in the security footage appear to be the same size, shape and weight as the two very large duffle bags subsequently recovered in the vicinity of the Residence and the very large duffle bag subsequently recovered inside the Residence, the three of which collectively contained approximately 64 kilograms of marijuana. An earlier version of the Complaint had stated that two of the very large duffle bags collectively contained approximately 64 kilograms of marijuana.

carrying the small duffle bag. Co-Conspirator 1 reached the intersection and appeared to be talking on a cellphone.

n. Also at approximately 2:22 a.m., the number ending 4466, as described in paragraph 4(b) above, called JONATHAN GOULBOURNE's phone number ending 1952. Co-Conspirator 1 then walked a few steps up Brighton 4 Court and entered a Dodge Caravan.

o. At approximately 2:23 a.m., the Dodge Caravan reversed down Brighton 4 Court and pulled to the left side of the road, near the entrance to the Residence.

p. At approximately 2:24 a.m., Co-Conspirator 1 returned to the Residence while still carrying a gun, peered inside the door, and then exited the Residence. Co-Conspirator 1 again fled southbound down Brighton 4 Court and entered the Dodge Caravan. The Dodge Caravan then drove southbound on Brighton 4 Court, turned left onto Oceanview Avenue, and drove away from the Residence.

q. At approximately 2:25 a.m., Subject 3 and Subject 4 fled the Residence, each carrying a very large duffle bag.

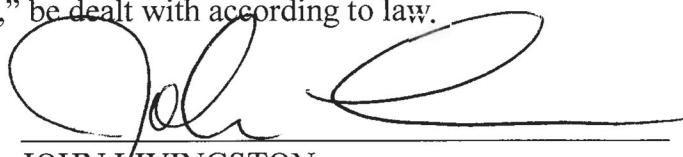
r. At approximately 2:27 a.m., the NYPD and paramedics arrived.

7. On or about December 3, 2021, Co-Conspirator 4 sought medical attention at the Jacobi Medical Center in the Bronx, New York for a gunshot wound to his abdomen, and he checked in using his real name. Security footage from the Jacobi Medical Center revealed that Co-Conspirator 4 arrived at the hospital in a silver Volkswagen Tiguan at approximately 3:05 a.m. Based on my training and experience, I know that the Residence is approximately 30 miles from the Jacobi Medical Center and that the drive from the Residence to the Jacobi Medical Center takes approximately 45 minutes.

8. On or about February 10, 2022, law enforcement observed a grey Dodge Caravan parked in the vicinity of JONATHAN GOULBOURNE's residence. On the same date, JONATHAN GOULBOURNE's partner stated that JONATHAN GOULBOURNE owns a Dodge Caravan and that she did not know anyone else who drove it.

9. On or about February 10, 2022, JONATHAN GOULBOURNE was placed under arrest for a violation of 21 U.S.C. § 846 in connection with the above-described incident.

WHEREFORE, your deponent respectfully requests that JONATHAN GOULBOURNE, also known as "Bobcat," be dealt with according to law.



JOHN LIVINGSTON  
Task Force Officer  
Federal Bureau of Investigation

Sworn to before me by telephone this  
\_\_\_\_ day of February, 2022

Ramon E. Reyes, Jr.  Digitally signed by Ramon E. Reyes, Jr.  
Date: 2022.02.10 16:55:13 -05'00'

HONORABLE RAMON E. REYES, JR.  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK